

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, ex rel.
JOHN M. GREABE,

Plaintiffs,

V.

Civil Action No. 04-11355-MEL

BLUE CROSS BLUE SHIELD ASSOCIATION
and
ANTHEM BLUE CROSS BLUE SHIELD
OF NEW HAMPSHIRE,

Defendants.

**DEFENDANTS' ASSENTED-MOTION
TO FILE MEMORANDUM IN EXCESS OF TWENTY PAGES**

Defendants Blue Cross Blue Shield Association and Anthem Blue Cross Blue Shield of New Hampshire (collectively, “Defendants”) hereby jointly move, with the assent of the relator John M. Greabe (the “Relator”), to file a Memorandum in support of their Joint Motion to Dismiss the Amended Complaint in excess of twenty pages.

As grounds for this Joint Motion, Defendants state as follows:

1. The Relator John M. Greabe assents to this Joint Motion.
2. Defendants' Memorandum in support of their Joint Motion to Dismiss is approximately 26 pages, including caption, signature blocks, and certificate of service.
3. Defendants are filing a single Joint Motion to Dismiss the Amended Complaint and single Joint Memorandum in Support thereof. In light of the fact that the

Memorandum addresses defenses to the action on behalf of multiple parties, Defendants believe that there is good cause for leave to file a brief in excess of twenty pages.

4. In addition, in light of the issues in this action, in the Joint Memorandum Defendants are required to provide detailed background information regarding applicable statutes and regulations, as well as regarding the federal program at issue.

5. Despite their best efforts, Defendants do not believe that these issues can be adequately briefed in twenty pages or fewer.

WHEREFORE, Defendants Blue Cross Blue Shield Association and Anthem Blue Cross Blue Shield of New Hampshire hereby jointly move, with the assent of the Relator John M. Greabe, to file a Memorandum in support of their Joint Motion to Dismiss the Amended Complaint in excess of twenty pages.

Dated: February 28, 2006

Respectfully submitted,

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*Counsel for Defendant Anthem Blue Cross
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CERTIFICATE OF SERVICE

I hereby certify that I have caused the foregoing Defendants' Assented-Motion to File Memorandum in Excess of Twenty Pages to be served electronically on the following on this 28th day of February, 2006:

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